

*IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
NORTHERN DIVISION AT KNOXVILLE*

IN RE:

VALENCIA MCCULLERS

Case No. **3:21-bk-30394-SHB**

Chapter 7

Debtor.

TRUSTEE'S APPLICATION TO EMPLOY COUNSEL NUNC PRO TUNC

Comes Ryan E. Jarrard, Trustee, pursuant to 11 U.S.C. §327(a), Fed. R. Bankr. P. 2014 and E.D. Tenn. LBR 9013-1(g)(1)(xx), E.D. Tenn. LBR 2014-1, and moves the Court for authority to employ counsel as follows:

1. The Debtor filed a voluntary Chapter 7 petition on March 12, 2021. Ryan Jarrard was appointed as Chapter 7 trustee and continues to serve in that capacity.
2. The Trustee wishes to employ an attorney to represent the estate with respect to investigating the estate assets, voiding a recorded and invalid deed, and to assist with all other needs of the estate.
3. The Trustee seeks authorization to employ Derrick M. Davis and the firm of Quist, Fitzpatrick & Jarrard, PLLC. The attorneys do not hold any interest adverse to the estate and are disinterested persons within the meaning of 11 U.S.C. §101(14).
4. The Trustee proposes to employ said attorneys at an hourly rate, as part of counsel's affidavit, attached hereto and incorporated herein by reference, and such expenses as may be allowed by the Court in accordance with the standard promulgated by the U.S. Trustee's Office, with the total amount of the compensation and expenses to be fixed and determined by the Court upon proper application at the conclusion of the attorneys' services.
5. The Trustee is entitled to employ an attorney, with Court approval, pursuant to 11 U.S.C. §327(a).

6. There is no application for a post-petition retainer. There are no actual or potential conflicts of interest. There are no other facts which would preclude retention of counsel.

WHEREFORE, the undersigned prays that he be authorized to employ the aforesaid attorney under the terms and conditions set forth, *nunc pro tunc* to the date this application is filed.

Respectfully submitted,

/s/ Ryan E. Jarrard

Ryan. E. Jarrard, Trustee

BPR No. 024525

Quist, Fitzpatrick & Jarrard, PLLC

800 South Gay St., Ste. 2121

Knoxville, TN 37929

(865) 524-1873 ext. 212

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/s/ Derrick M. Davis

Derrick M. Davis

BPR No. 037122

Attorney for Ryan E. Jarrard, Trustee

Quist, Fitzpatrick & Jarrard, PLLC

800 South Gay St., Ste. 2121

Knoxville, TN 37929

(865) 524-1873 ext. 210

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Trustee's Application to Employ Counsel, Affidavit of Professional Person and proposed Order have been served upon the indicated parties by placing a copy thereof in the U.S. Mail, first class postage prepaid, via email or ECF this May 14, 2021:

Tiffany DiIorio
800 Market Street, Suite 114
Howard J. Baker Jr. US Courthouse
Knoxville, TN 37902

All Parties in Interest on the attached mailing list.

/s/ Ryan E. Jarrard

Chapter 7 Trustee